

**United States Bankruptcy Court
For the Southern District of Texas
Corpus Christi Division**

In re: § Case No. 18-20484
Teresa Brown Cryer §
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§
§
Debtor(s) § Chapter 13

DEBTOR'S RESPONSE TO TRUSTEE'S MOTION TO DISMISS

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

NOW COMES, Debtor(s), in the above styled matter by and through attorney of record, and files this response to the *Trustee's Motion to Dismiss* and would show and request the following:

1. Debtor(s) hereby requests a Hearing on the Trustee's Motion to Dismiss.
2. Debtor's employer issued several payments to the Trustee, but the payments were never cashed or returned to the employer. Debtor is requesting a continuance because the employer is going to re-issue payment to the Trustee.

WHEREFORE ALL PREMISES, CONSIDERED, Debtor(s) respectfully requests the Court to grant the Debtor(s) a Hearing and upon such Hearing, Deny the Trustee's Motion to Dismiss and award Debtor(s) all further relief to which debtor(s) may justly be entitled.

Respectfully submitted,
The Law Offices of Joel Gonzalez, PLLC

/s/ Joel Gonzalez

Joel Gonzalez, Attorney for the Debtor
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CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of November, 2021, a true and correct copy of this Debtor's Response to the **Trustee's Motion to Dismiss** was served via First Class Mail and/or via electronic mail to all the parties listed below.

Chapter 13 Trustee

Cindy Boudloche - Trustee
555 N. Carancahua, Ste. 600
Corpus Christi, Texas 78475

U.S. Trustee

515 Rusk, Ste. 3516
Houston, Texas 77002

Debtor(s)

Cryer, Teresa Brown

226 Lakeview Drive
Mathis, TX. 78368

/s/ Joel Gonzalez

Joel Gonzalez, Attorney for the Debtor